

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

**UNITED STATES OF AMERICA**

**v.**

**Case No.: 2:21-CR-0027**

**SEAN CHRISTOPHER WILLIAMS**

**MOTION TO REQUEST FUNDS FOR EXPERT**

1. The defendant is trying to establish that the wall in question in case CR-27 is an 8" solid cast-in-place concrete partition wall that divides two cells.
2. And to establish that the "concrete" allegedly removed from the wall is in fact not concrete but a patching material and that the patches have failed resulting in further remedial repairs being completed by simply applying caulking to the loose material to hold it in place.
3. Also to establish that the entire facility has similar conditions at the floor joints as a result of active structural settling of the foundation slab independently from the pylons that support the vertical walls. The result is a gap at the floor level that is filled with failing repairs caulked together over the years.
4. It is important to establish this information because the material in question is frequently removed by inmates from many cells to facilitate the passing of small items between cells and that the material can easily be removed by hand by simply peeling away the flexible caulking and further establish that the approximate 1" tall "cold joint" could in no way facilitate any type of escape and that similar conditions exist in many of the cells.
5. Also to establish that the "4 feet" of material removed from cell 5 does not and cannot represent what may have been removed by the defendant because any length of material up to the length of the cell can be removed by hand.
6. Therefore for the prosecution to state that the defendant removed all this material is misleading. In other words, once one piece of material is taken out, it acts as a keystone allowing all of the connecting material to be very easily removed.

WHEREFORE, the defendant is requesting that a licensed building inspector or general contractor be retained to determine the facts set forth herein.

SEAN CHRISTOPEHR WILLIMAS

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CERTIFICATE

Sent via email from elbow counsel to [grvlclerk@tned.uscourts.gov](mailto:grvlclerk@tned.uscourts.gov) for filling and to [meghan.gomez@usdoj.gov](mailto:meghan.gomez@usdoj.gov) and [greg.bowman@usdoj.gov](mailto:greg.bowman@usdoj.gov) on July 19, 2024